

November 15, 2002

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Dear Mr. Horyza:

Attached please find Agua Fria National Monument Scoping comments, and the Agua Fria National Monument proposed Transportation Plan. Thank you for the opportunity to comment on this biologically and culturally vital national treasure.

We appreciate your work in protecting our natural and cultural heritage.

Sincerely,

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Agua Fria National Monument Scoping Comments

The “ancient ruins,” “prehistoric sites,” “petroglyph sites,” “historic sites,” “semi-desert grassland,” “riparian forest,” “topographical features,” “water,” “vistas,” “visually spectacular settings” and “habitat for...sensitive wildlife species” are objects listed in the proclamation of this monument.

Protect this monument for today and for the future by planning management strategies that take into account the human population growth occurring all around the monument.

Please implement the following suggestions in the management of this monument:

- **Motorized Travel**

Enforce the proclamation’s motorized and mechanized travel restrictions, and prevent development of new facilities or travelways within the monument. To meet the monument proclamation’s requirement that all cross-country travel be prohibited, a transportation plan should be created. All motorized and mechanized travel should be prohibited except on these designated roads or on designated campsites.

A critical element of protecting remoteness and natural splendor is preserving limited travel corridors. Since the monument was designated, many new tracks and trails have been created by motorized and mechanized vehicles. This off-road vehicle use is prohibited by the proclamation, and is directly harming monument objects by fragmenting habitat, disturbing natural vegetation patterns, facilitating the spread of exotic plants, eroding scenic qualities, and damaging archaeological and cultural objects.

- **Legal Definition of a Road**

The Bureau of Land Management must apply the legal definition of a road on public lands, derived from the definition of “roadless” in the legislative history of FLPMA:

The word “roadless” refers to the absence of roads which have been improved and maintained by mechanical means to insure relatively regular and continuous use. A way maintained solely by the passage of vehicles does not constitute a road. (H.R. Rep. No. 94-1163 at 17(1976)).

Thus, tracks created by the repeated passage of motorized or mechanized vehicles, people, or wildlife, or anything else, standing alone, do not constitute a road; mechanical improvement, whether by hand tools or power machinery, is necessary. In other words, “use” or “nonuse” of a given route is inadequate information to determine whether or not it is a legal road. This definition also applies to routes of travel within washes or river corridors. Washes or river corridors cannot be considered roads, as their perseverance through water flow or runoffs and/or occasional use does not meet the definition of “mechanical improvement or maintenance.”

BLM must adhere to their own rules by applying this definition, both internally and publicly, in creating alternatives for a road network within the Agua Fria National Monument. The monument proclamations specifically prohibit “off-road” vehicle use except for emergency or authorized administrative purposes. Therefore, by the legal authority of the proclamation and FLPMA Management, a monument transportation network must not include tracks, trails and other routes which do not meet the definition of a road.

- **Agua Fria National Monument Transportation Plan**

Adopt the Agua Fria National Monument Transportation Plan, supported by conservation and community groups. This is a public transportation network of legal “roads,” that provides reasonable access to the monument, without harming monument objects. This network retains some very ecologically and archaeologically sensitive areas as accessible solely through primitive, non-motorized, non-mechanized access to protect the monument objects these areas harbor. It also provides motorized and mechanized travel corridors through or to the monument’s most scenic areas. The suggestions put forward in this Plan should be implemented promptly, as an interim management strategy to protect the monument’s objects against the massive population growth around the monument’s boundaries, as well as concurrent increases in visitor use and illegal vehicle traffic. Please see attached map and documentation for a further description of this plan.

- **Motorized and Mechanized Access**

Close and restore all “wildcat” or illegally created motorized and mechanized travelways that do not meet the legal definition of a road under FLPMA. These travelways are clearly prohibited by the monument proclamations. Close and restore all redundant and dead-end routes.

Assess all legal travelways for their impact on monument objects. Travelways must be assessed for their impact on soil compaction and erosion, exotic plant germination and distribution, water drainage and watershed quality, fragmentation of wildlife habitat and travel corridors, disruption or damage of archaeological and cultural sites, damage or obliteration of historic trails, air quality (dust pollution), natural quiet, and interruption of scenic qualities.

Close and restore all travelways, legal or illegal, which are found to currently or potentially harm protected monument objects.

Restore closed roads and travelways by raking soils, removing berms, replanting with appropriate native vegetation and other known successful methods to obliterate visual evidence of any motorized or mechanized travelway. Some closed motorized or mechanized travelways may function well as foot trails.

Actively enforce route closures. This will require considerable less staff time and money over the long run if travelways are closed as suggested above.

Maintain existing quality of roads chosen for public transportation network. “Road improvement” should not be undertaken.

- **Recreation Management**

Carefully managing tourism is the best way to ensure our grandchildren will still be able to enjoy Agua Fria as the wild and spectacular place it is today. Recreation is not a value or object of the monument; the proclamation states the monument was created to protect wildlife and wild places known collectively as monument “objects”. Recreation is only permissible when and where it does not impact these monument objects. Recall that the grasslands, river canyons, wildlife habitat, and archaeological sites are important monument objects listed in the proclamation. Recreation must not be permitted where and when it harms this desert environment.

Many people camp in Agua Fria. Fire rings and vehicle pullouts are common in the monument. These sites destroy native vegetation and can disturb wildlife and wildlife travel corridors. To protect these monument objects, the monument should be managed to provide “designated, dispersed camping.” This means BLM must find appropriate dispersed camping sites (presumably ones which already exist but are now undesignated) that do not damage archaeological resources, destroy native plants or interfere with the survival or travel of pronghorn, or harm other monument objects. None of the designated sites should be within the river canyon or side canyons themselves. These canyons should have only non-developed, non-designated primitive camping due to the changing nature of beaches and river corridors. Designated sites outside the canyons and riparian zones should not be developed, but must be clearly signed as campsites. Interpretive signs at the entrances to the monument must provide maps and information clearly showing the public transportation network and the designated camping sites. All undesignated campsites should be rehabilitated in the same fashion as undesignated motorized travelways, so they will no longer be visible and tempting to use. This system will curtail the proliferation of visitor-created campsites throughout the monument, while allowing visitors to have a camping experience complete with solitude and remoteness.

Designation and interpretation of any archaeological sites other than La Plata Pueblo site should be based on the principle of zoning. Designated cultural sites or other areas where the bulk of visitors are directed should be in zones closest to the perimeter of the monument and most accessible to human use/visitation and staff monitoring and enforcement. Core, interior monument areas rich in protected biological, scenic and cultural objects should be managed as primitive, roadless zones (i.e. the Agua Fria River canyon and its tributary canyons, and archaeologically rich areas on the Perry Mesa). This system will offer the greatest amount of protection to the most undamaged and valuable monument objects, and will provide a variety of human access opportunities, both motorized and primitive. It will also lessen the BLM staff’s burden of enforcement activities, by concentrating much of the enforcement needs within the perimeter zones.

BLM must monitor visitor use in the monument, and curtail or modify recreational uses that threaten to harm monument objects.

Limit group size of trips and tours to protect monument objects.

Do not permit any new airstrips within the monument. Air traffic into the monument will create an unmanageably large number of new visitors, which will in turn harm monument objects.

Limit granting of Special Recreation Permits (SRP's) to prevent overrunning the monument with human traffic. SRP's can be granted only when and where they do not harm monument objects. SRP requests must be analyzed for their impact on: cultural and historical objects and culturally important sites; fossils and geologically important sites; native biodiversity; wildlife habitat; native monument species including sensitive species; watershed health and water quality; soil erosion and compaction; seeps and springs; scenic qualities; opportunities for solitude; spread of exotic plants; native vegetation diversity and abundance; and cumulative visitor impact. Do not grant SRP's for new motorized or mechanized activities that would negatively impact monument objects. Do not grant SRP's that would allow for any off-road vehicle travel, as this would be contrary to the monument proclamation. Do not grant SRP's that would expand the "limited travel corridors" noted in the proclamation.

It is critical to limit recreational opportunities in sensitive monument areas, in anticipation of massive human population growth around the boundaries of the monument, and concurrent increases in visitor use.

Ensure ample opportunities for non-motorized and non-mechanized recreation, solitude and natural quiet. Remote and undeveloped areas are what create the special character and value of the monument. These areas do not preclude human use, but instead provide a plethora of opportunities for low-impact recreation activities such as backpacking, hiking, bird watching, visiting selected archaeological sites, and hunting.

Locate monument visitor services outside of monument boundaries. Do not place monument signs where they will draw excessive traffic from major thoroughfares. BLM funding and staff levels for this monument make it impossible to protect monument objects and values while simultaneously encouraging a massive new influx of tourism.

Do not place visitor interpretive stations or information in the proposed new Sunset Point northbound rest area, because this is within the monument, very close to one of its main access points (Badger Springs Road) and will draw too many new visitors off I-17 to recreate there (i.e., an unmanageable number or so many that it results in damages to monument objects).

- **Visitor and Resident Safety**

Ban target shooting within the monument to protect monument wildlife and plant objects, and ensure the safety of residents and visitors.

Ensure hunters observe shooting restrictions around designated camping areas, travel routes and other facilities.

Illegal trash dump sites should be cleaned and rehabilitated, and motorized routes leading to them closed, so the public is no longer tempted to use them.

BLM should allocate adequate funding for enforcement of monument uses.

- **Community Relationships and Stewardship**

Agua Fria should be managed in the context of the surrounding communities as well as for the national interest. For example, locating visitor services in surrounding communities builds ownership within those communities for the long-term protection of Ironwood and creates economic opportunities for citizens. It will also demonstrate to visitors the relationship of the Ironwood landscape to the communities, so they do not view the National Monument as an enclosed land mass separate from the people who live nearby.

- **Easements and Rights-of-Way**

Do not approve new power lines, pipelines, communication lines, or other long linear disturbances within the monument. Oppose the creation of power lines or power plants near the monument borders. Power lines generate new roads,

compacting soils and destroying native vegetation, and impacting wildlife travel corridors. Additionally, power lines and power plants damage the scenic qualities and viewsheds of the monument.

- **Biological Values**

Recreational impacts increase with urban sprawl and may be the single greatest long-term human threat to the Monument and its wild inhabitants. For example, illegal trash dumping in the Monument has increased considerably over the past year or two. Tortoises have been known to ingest this trash which may be detrimental to their health (Averill-Murray 2002). The cumulative effects of illegal roads and of repeated motorized visitation to more isolated sections of the Monument (with, for example, increased woodcutting by campers) will over time degrade the values for which this land was protected as a Monument.

Driving in washes and river corridors by motorized recreationists is especially egregious. Washes and river corridors tend to have more cover and serve as areas where many animals, from quail to peccaries and deer, regulate their body temperatures. Stress caused by vehicles could impair their fitness. Mortality to tortoises who nest along the banks of washes is yet another reason for closing washes to motorized and mechanized traffic. Washes and river corridors are not legally roads (according to FLPMA, discussed elsewhere) and so vehicles should automatically be prohibited from using them. It cannot be repeated enough that the Proclamation for AFNM talks only of protecting scientific objects of interest and not at all about providing human recreation.

Inventory and monitoring

We understand that plant and animal inventories are being done by Desert Botanical Garden and the Sonoran Audubon Society, but it is not clear whether researchers are analyzing the status (i. e. population viability) of each species or simply registering presence/absence. This is not to suggest that every species be subject to intensive analysis, but the BLM should be selecting certain species to monitor closely.

Monitoring is an indispensable activity and it is imperative that the BLM create a monitoring plan as well as a protocol by which the revelations of monitoring (if unwelcome) translate rapidly into a change in management, e.g. seasonal restrictions in areas of bighorn use. Monitoring should probably include the numbers and activities of visitors and the extent to which human activities negatively impact the values of the monument.

Roads, Access, and OHVs.

Driving in rural landscapes, particularly on rough (or non-existent) roads, has become extremely popular among a very vocal and increasingly well-organized constituency. One hates to interfere with other people's enjoyment; yet a voluminous literature has developed on the impacts of roads to the ecology and wildlife of an area. A tension has thus been created between individual freedom and broader, long-term social and ecological values; symptomatic of our culture in general, special interest groups tend to prevail. In terms of this monument however there should be no dilemma. Protection of the scientific objects of the monument must take precedence over demand for motorized access and recreation. A broader discussion of roads appears elsewhere in this document but it is clear that existing roads, including illegal wildcat routes, are already impacting the values of the Monument, causing erosion, creating fragmentation and increasing access to areas of sensitive habitat, or to private property. Illegally-created routes must be closed and driving in washes and river corridors prohibited. Monitoring and enforcement of route closures must be increased. The Agua Fria National Monument Transportation Plan discussed earlier in this letter provides reasonable access to enjoy the Monument while meeting these protection goals

Grazing

Grazing in the monument needs to be monitored for impacts to the ecology and to prehistoric archaeological sites. If stocking rates exceed carrying capacity, recruitment of ironwood and other seedlings, might be reduced and openings for the exotic, and highly destructive, buffelgrass might be created. Grazing needs to be analyzed for its compatibility with the

protection of the special objects of the Monument, i.e. the health of the desert and the viability of native species. For example, desert tortoises are known to be adversely impacted by livestock grazing, which compete for forage resources and trample animals directly [Brooks, 1995 #2052; Berry, 1979 #340; BLM, #2107].

Assess grazing and rangeland conditions as per Handbook 4180-1, Rangeland Health Standards: establish a consistent, defensible approach to analyze rangeland conditions (including logically connected data, indicators, standards, and conclusions); conduct field assessments of all allotments, including collection of quantitative data to monitor rangeland conditions; use an interdisciplinary team to conduct assessments; ensure allotments meet standards; remove or restrict cattle on allotments where standards are not met. Livestock should be removed promptly from any rangeland assessed as falling below the "good" or "stable or upwards trends" condition.

Consider the impact of livestock on wildlife. Remove livestock from areas where they compete with monument wildlife objects, such as in archaeologically rich areas, riparian corridors and native fish and pronghorn antelope habitat. Silver Creek and Agua Fria must be monitored to determine if grazing within these riparian corridors is damaging the habitat and survivability of the possibly endangered Gila Chub.

Evaluate the impact of livestock on cultural and historical monument objects. Cattle should be removed from sensitive archaeological and historical sites. Cattle are known to "produce significant physical damage to lithic artifacts" (Roney 1977). Livestock can also interfere with site structure and dating by trampling. Trampling impacts soils and can lead to collapse of stream banks, vegetation removal, and soil compaction, which can in turn reduce water infiltration and increase run-off (Horne and McFarland 1993). Cattle also damage archaeological structures, through "displacement and loss of masonry elements, toppling of walls, loss of interior features and other construction details, churning of fill, and undermining of walls and foundations..." (Glen Canyon National Recreation Area Environmental Assessment 1999).

Fragmentation

The findings of conservation biology have shown that the size of an area is critical to the maintenance of an intact biological community. The BLM must manage this Monument with a landscape perspective, at several scales: that of single organisms and their relationships, the Monument as a whole, and at a regional scale that looks at the Monument within the broader context of its surroundings. Monitoring might show if species viability is being threatened by isolation, i.e. if movements to certain areas have been cut off or if mates cannot be found.

Ideally, the BLM should compile a list of the scientific objects to be protected (biological and cultural) and figure how best to ensure their protection (mostly by limiting human uses). The Transportation system would, for example, be certain to generously avoid pronghorn birthing sites. Unfortunately this procedure has its limits as ultimately we are ignorant of the community roles of most species. The BLM must really protect everything out there; focusing on known areas of sensitivity or value or struggling species but recognizing that everything is inter-connected in ways we may never understand. This mystery is part of the allure of places such as Agua Fria National Monument.

Monitoring and Limits of Acceptable Change

BLM must monitor visitor uses and impacts as well as the ecological health of the monument. Guidelines or triggers for action to protect monument objects should be developed. These "limits of acceptable change" should focus on vulnerable parameters such as sensitive and/or indicator species, numbers and impacts of people, grazing, wildcat (illegal) routes, and any other issues which might result in harm to monument objects. Unwelcome changes in these parameters must be recognizable and must automatically "trigger" a reaction of a specified sort, designed to immediately mitigate the harm to monument objects.

BLM must monitor both common and specialized native species to determine ecosystem health. This would include a range of species prevalent throughout the monument as well as species dependent on restricted habitats. Pollinators, seed dispersers, rodents and carnivores, and riparian species should be monitored, as well as the larger flagship species such as pronghorn and desert tortoise.

Habitat Restoration

BLM's goal should be to manage for a natural range of native plant associations. Prevent introduction and spread of exotic plants. Monitor and assess rangeland conditions to ensure cattle or existing ranching practices are not introducing or

encouraging the spread of exotic plants. Do not allow chaining or other destructive land disturbance-based “restoration” projects. Revegetation and/or rehabilitation of native vegetation must be done exclusively with native species.

Species Management

Protect black hawk nesting sites and bald eagle migration corridors in the Agua Fria river and its tributaries.

Protect Pronghorn antelope by maintaining healthy grassland habitat with adequate native diversity and growth to provide forage and cover for the antelope to hide their young.

The Agua Fria River and its tributaries are vital habitat for indigenous fish species, including the Gila Chub, which has been proposed for listing as Endangered with Critical Habitat (USFWS, 2002). There are six tributaries in the Agua Fria River in which Gila chub exist; Little Sycamore Creek, Sycamore Creek, Indian Creek, Silver Creek, Larry Creek, and Lousy Canyon. The Agua Fria River Area represents part of the upper northwest area of the historical range of the Gila chub, and current Gila chub populations in the six drainages of this river area are healthy. There have been no reports of any diseases associated with the Gila chub in this unit. Survey results indicate a good representation of all age classes. Gila chub were translocated to Larry Creek and Lousy Canyon as a conservation action in July 1995 by the BLM. The BLM continues to monitor these populations in Lousy Canyon and Larry Creek and has changed their grazing management to help reduce adverse effects to these healthy Gila chub populations. Conserving these Gila chub populations will help maintain representation of the species throughout its historic range. In addition, these populations can be used in future repatriation activities in other areas of the Gila chub historic range.

Gila chub prefers quiet deep waters and pool, areas with cover and terrestrial vegetation, boulders, fallen logs, undercut banks... can survive large stream habitat and artificial habitat. Adults are usually found in deep pools and eddies away from swift currents; young-of-the-year prefer shallow, vegetated areas; and juveniles tend to use faster moving streams (USFWS 51957, 2002)

The following are listed by USFWS as primary constituent habitat elements necessary for survival and recovery of Gila chub:

- “1. Perennial pools, areas of higher velocity between pool areas, and areas of shallow water among plants or eddies all found in small segments of headwaters, springs, or cienegas of smaller tributaries.
2. Water temperatures for spawning ranging from 20 to 26.5°C (68 to 79.7°F) with sufficient dissolved oxygen, nutrients, and any other water related characteristics needed.
3. Water quality with reduced levels of contaminants or any other water quality characteristics, including excessive levels of sediments, adverse to Gila chub health.
4. Food base consisting of invertebrates, filamentous (threadlike) algae, and insects.
5. Sufficient cover consisting of downed logs in the water channel, submerged aquatic vegetation, submerged large tree root wads, undercut banks with sufficient overhanging vegetation, large rocks and boulders with overhangs.
6. Habitat devoid of nonnative aquatic species detrimental to Gila chub or habitat in which detrimental nonnatives are kept at a level which allows Gila chub to continue to survive and reproduce. For example, the Muleshoe Preserve and Sabino Canyon Gila chub populations are devoid of nonnative aquatic species. The O'Donnell Canyon Gila chub populations has continued to survive and reproduce despite the current level of nonnative aquatic species present.
7. Streams that maintain a natural unregulated flow pattern including periodic natural flooding. An example is Sabino Canyon which has experienced major floods. If flows are modified, then the stream should retain a natural flow pattern that demonstrates an ability to support Gila chub (USFWS 51958, 2002).”

According to the USFWS press release associated with this document, “The Service has also proposed designating critical habitat for 26 of the 31 populations along headwater streams of seven rivers. The proposed critical habitat designation includes 208 miles of these streams and includes a 300-foot riparian zone adjacent to each side of the river.”

Protection of this riparian zone and the river water themselves is an important element in preserving these fish as monument objects. Proper management or elimination of cattle grazing is necessary to reduce sedimentation and protect habitat and stream cover. Vehicles must also be kept out of streams and habitat for the same reasons.

Also present in the monument are longfin dace, speckled dace and Gila mountain sucker; native species that are not listed under the ESA. Longfin dace has been recommended for candidate status. Speckled dace has been petitioned for listing. Gila mountain sucker (also known as the desert sucker) has also been recommended for candidate status. All were

former C2 species dropped from candidate list in 1996. These species should be protected and their populations maintained to prevent their becoming threatened or endangered. Management of the Agua Fria as Wild & Scenic, and designation of the river canyon and its tributary canyons as wilderness will prevent degradation of fish habitat by eliminating pollution, increased turbidity, and other habitat damages from vehicle use of river corridors.

Ecosystem Management

Designate and manage critical areas to protect against harm to monument objects: keep these critical areas roadless and open to non-motorized and non-mechanized recreation only. To ensure consistency with monument proclamations and to protect monument objects, the following ecosystems should be protected as core roadless areas: Lousy Canyon, Agua Fria River canyon, Baby Canyon, Perry Tank Canyon, and the existing Area of Critical Environmental Concern (ACEC) in Larry Canyon. This ACEC should be monitored and carefully managed to meet its purpose of protecting rare riparian species and archaeological sites.

Animal Damage Control

BLM should prohibit animal damage control on the National Monument. Response to animal "issues" should be restricted to individual offending animals rather than entire predator populations. The monument management plan should clearly state that BLM can restrict animal damage control activities and that APHIS ("wildlife services" of the U.S. Department of Agriculture) must honor this plan.

Water Quality

Ensure that mining operations, ranching and any water developments (i.e. the sunset rest area pipeline) in or near the monument do not detrimentally impact monument watersheds and aquifers. BLM should test and monitor the quality of groundwater resources to ensure local mining and ranching operations are not polluting the monument aquifer. Any pollution should be paid for and cleaned up by the polluter.

Water Rights and In-stream Flow Protection

The monument proclamation reserves (subject to valid existing rights) unappropriated water necessary to protect monument objects. BLM should be using the planning process to compile information and make assessments about the needs of the monument objects for both groundwater and surface water. One reason to do this is for eventual quantification of monument water claims. This assessment should also include an examination of any water rights now associated with monument lands, such as federal reserved water rights under earlier reservations (e.g., springs and water holes) or water rights established under state law.

BLM should be working with its attorneys and pertinent state governmental officials to make sure it takes timely and appropriate steps to protect the water rights associated with the monument lands. Such steps could include, among other things, (1) participating in any general stream adjudication covering the monument area that the state initiates and serves the United States under the McCarran Amendment, to make sure that water rights claims for the monument are filed and protected; and (2) monitoring and otherwise becoming apprised of any new or proposed water developments that could threaten water supplies important to the monument. Examples of such proposals would be a new diversion of water upstream from the monument, or a new well drilled outside the monument or on an inholding in the monument. BLM should be in contact with the pertinent state officials so that it can be made aware of such proposals in time to make appropriate responses.

Protect in-stream flow levels commensurate with survival of indigenous fish and other native wildlife, preservation of scenic qualities, protection of native plant communities, and perseverance of ecological and hydrological features including beaches, deep pools, areas of rapid water current, eddies, and riparian vegetation zones.

• Cultural, Historical and Archaeological Objects

Consult with local tribes on important cultural areas and sites. Fund surveys and mapping of archaeological sites and sensitive areas within the monument. Analyze all existing vehicular travelways for their impact on cultural, historical and archaeological objects. Close and rehabilitate all travelways which harm these objects.

Prohibit livestock and motorized and mechanized traffic in all known and suspected cultural sites. Protect archaeological and historical sites from looting.

- **Mining**

Prohibit any mining expansion or exploration.

- **Wilderness**

Adopt the Arizona Wilderness Coalition's proposed wilderness study areas for Agua Fria National Monument: Agua Fria River Canyon Wilderness (11,892 acres) and the Perry Mesa Wilderness (16,775 acres). These two areas total 28,667 acres of wilderness in the monument, which is less than 40% of the monument lands. Wilderness is the strongest form of multi-species protection, and an excellent way to protect the natural and cultural objects for which the monument was created.

The public considers wilderness an important element in their quality of life. Therefore, it has a high socioeconomic value. A study by Haynes and Horne (1997) found that wild, roadless areas have intrinsic values and generate additional recreational values for visitors, approximately double that of roaded areas.

- **Protection of Natural Quiet**

The protection of natural quiet has been recognized as a land resource for years. For instance, President Harry Truman in 1949 issued an executive order establishing an airspace reservation for certain areas of the national forests. The order prohibited flights over specified regions of the forest below certain altitudes. Congress later incorporated this executive order into the Boundary Waters Canoe Area Wilderness Act.

Congress first took specific action concerning natural quiet at Grand Canyon National Park (GCNP) in the Grand Canyon National Park Enlargement Act of 1975. In 1987, President Reagan signed a much stronger law -- The National Parks Overflights Act, which called for "substantial restoration of the natural quiet" at GCNP (Public Law 100-91).

It is important that natural quiet issues be addressed for their own sake in the monument. The effects of aircraft and ground-based activities should be addressed.

Natural quiet is fundamental to the experience of solitude in the national monument. We realize total natural quiet is not always possible in all areas. However, it must be part of the management plan to assure that it is not ignored. Natural quiet is one of the premier resources that attract visitors to our open spaces. While various activities will be allowed in the monument, certain areas should be managed to facilitate primitive, non-motorized, non-mechanized recreation. Natural quiet is a necessary resource for this type of recreation.

- **Planning Issues**

The previous RMP which dealt with some of the lands now in Agua Fria National Monument cannot be used as a starting place for monument planning, or as a model for land uses or transportation networks within the monument. This RMP was created before the area was declared a monument, when there was an entirely different mandate and philosophy directing the uses of this land. As well, the population of the closest large metropolitan area, Phoenix, was significantly smaller when the previous RMP was adopted. The population in the Phoenix area is expected grow exponentially by the year 2020, as is that of other nearby communities including Prescott and Prescott Valley. Most other areas in central Arizona are experiencing similar population percentage increases. The previous RMP is simply not relevant due to the changed status of the land designation and to the explosive increase in nearby urban population.

National Monument status raised the bar for the management of these lands, specifically requiring that they be managed solely for the protection of the monument objects. The decisions made in the previous RMP do not meet this requirement nor reflect this new guiding philosophy, and are therefore irrelevant and inappropriate to use as planning tools. A new set of management guidelines and policies must be developed specifically for the new monument, through the public planning process now in place.

- **Land Ownership Issues**

Identify and pursue land purchases from willing sellers to consolidate holdings in monument (State Trust Land and private). Priority areas include: horseshoe ranch, and the new river mountains in the Tonto National Forest.

Remove the approximately 17,000 acres of BLM land in the Dewey-Mayer-Humboldt area from the disposal list to protect open space, archaeological sites, wildlife habitat, and the Agua Fria river watershed.

Do not dispose of any lands within the Monument, or exchange them for development. Do not allow new development within the monument.

Expand Agua Fria National Monument to include wildlife habitat, open space, riparian areas, and critical archaeological sites in the Tonto National Forest. Important archaeological sites which are part of the same cultural system as found in the Agua Fria National Monument are also located on National Forest lands bordering the monument.

Indian Creek, Sycamore Creek, and Little Sycamore Creek are part of the Agua Fria River system located on private and Prescott National Forest lands. These creeks are known habitat for the possibly endangered Gila Chub. BLM should work with the Prescott National Forest and private landowners to preserve these riparian corridors and protect the Chub population and the watershed of the Agua Fria River system.

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Agua Fria National Monument Transportation Plan

We recommend the Agua Fria National Monument Transportation Plan for the following reasons:

Private and Administrative Access

This Transportation Plan and Map address only **public** roads. Access roads for BLM, residents, and ranchers are not shown, as they remain open only to individuals or entities with permission to use them.

Public Access

The Agua Fria Transportation Plan provides motorized public access into and through the monument, including a number of scenic driving tours and access to key monument features. This Plan recognizes the rights of all private property owners and State and BLM grazing leasees within the monument to access their property and facilities.

Resource Protection

Agua Fria NM contains a diverse and spectacular biological community, and numerous archaeological resources. The excessive number of travelways currently utilized by motor vehicles fragment wildlife habitat, including pronghorn antelope travel corridors, and damage archaeological sites, vegetation, soils, scenic qualities, and local hydrology. Minimizing the number of travelways for motorized vehicles will help prevent further damage, preserve scenic qualities and allow for restoration of monument resources.

Public Safety

The number of vehicular access points and travelways now within the monument compromises the safety of visitors and residents. The Bureau of Land Management does not have the resources or staff to monitor and enforce conditions required for public safety on all these travelways. In order to ensure that monument residents and visitors are protected from stray gunshots, traffic, and illegal activities, the Agua Fria Transportation Plan provides manageable access into and through the monument.

Protection of Public Property

The unmanageable number of travelways in the monument creates a condition where illegal trash dumping, archaeological looting, and cross-country ORV uses, as well as legal recreation activities, are difficult to monitor and enforce. The Agua Fria Transportation Plan provides reasonable, manageable access, enabling enforcement personnel to address this issue.

Road Rehabilitation

Routes which are not included in the designated public, private or administrative transportation systems must be closed and rehabilitated. Rehabilitate closed roads and travelways by raking soils, removing berms, replanting with appropriate native vegetation and other known successful methods to obliterate visual evidence of any motorized or mechanized travelway. Some closed motorized or mechanized travelways may function well as foot trails.

BLM Legal Definition of a "Road"

According to the statutory mandate of FLPMA and official BLM policy, off-road vehicle trails and other wildcat tracks do not meet the legal definition of a road, and thus may not be included in a

transportation system, per the monument proclamation. The monument proclamation specifically prohibits use of motorized vehicles off-road except for emergency or authorized administrative purposes.

The FLPMA road definition states, " A way maintained solely by the passage of vehicles does not constitute a road, " and that roads must be "improved and maintained by mechanical means to insure relatively regular and continuous use." (H.R. Rep. No. 94-1163 at 17(1976)).

Thus, tracks created by the repeated passage of vehicles, people, or wildlife, or anything else, standing alone, do not constitute a road; mechanical improvement, whether by hand tools or power machinery, is necessary. "Use" or "nonuse" of a given route is inadequate information to determine if a travelway is a "road". This definition also applies to routes of travel within washes or river corridors. Washes or river corridors cannot be considered roads, as their perseverance through water flow or runoffs and/or occasional use does not meet the definition of "mechanical improvement or maintenance."

BLM must adhere to the law and their own policies by following this definition, both internally and publicly, for a road network within the Agua Fria National Monument. The Agua Fria Transportation Plan meets this goal while providing reasonable visitor access.

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Proposed Travelway System for Agua Fria National Monument



